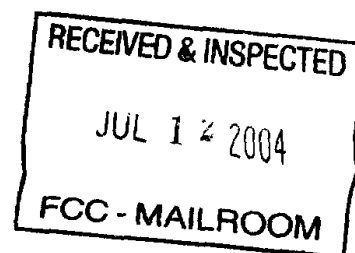




American Gas Association

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July 8, 2004

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Subject: Notice of Proposed Rulemaking, CC Docket No. 92-105: FCC 04-111
The Use of N11 Codes and Other Abbreviated Dialing Arrangements

Dear Ms. Dortch:

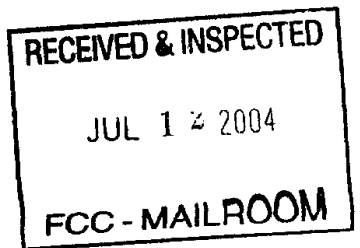
The American Gas Association is electronically filing this cover letter and the Association's comments on the subject Notice of Inquiry, that was published in the Federal Register, 69 FR 31930, June 8, 2004.

Sincerely,

George J. Mosinskis

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**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.**



Proposed Rule: The Use)	CC Docket No. 92-105;
N11 Codes and Other Abbreviated)	FCC 04-111
Dialing Arrangements)	
)	
)	

Comments of the American Gas Association

I. Background

The American Gas Association (AGA) represents 192 local energy utility companies that deliver natural gas to more than 53 million homes, businesses and industries throughout the United States. AGA is an advocate for local natural gas utility companies, and provides a broad range of programs and services for member natural gas pipelines, marketers, gatherers, international gas companies and industry associates. Natural gas meets one-fourth of the United States' energy needs and is the fastest growing major energy source. The underground utilities that are the subject of this proposed rule are essential to the nation's energy and communication infrastructure.

The AGA supports the goals of section 17 of the Pipeline Safety Improvement Act of 2002, which required the establishment of a 3-digit nationwide toll-free telephone number system to be used by State One Call notification systems. Natural gas operators continually work to reduce pipeline incidents and to further improve the industry's excellent safety performance. Excavation damage has caused almost 60 percent of AGA member company reportable incidents involving natural gas pipelines in the past 15 years. As a result, these operators intensified their public education effort to communicate the message of dialing before you dig.

There are many One Call Centers throughout the country, each with its own phone number for the geographic territory it serves. Some states have multiple One Call Centers. Creating a national three-digit number that causes all telephone calls to be automatically directed to the dialer's appropriate One Call Center will undoubtedly reduce damages. AGA applauds the North American Numbering Council's actions to implement this three-digit number. Reducing underground damages results in more reliable service for utility customers, avoids property damage, benefits the environment, and most importantly, saves lives.

II. Summary of AGA Comments

AGA strongly supports the proposal by the FCC to establish a national 3-digit dialing number to connect to the local One Call Center. Our member companies prefer the 811 code because it more completely satisfies the requirements of the Pipeline Safety Act. This code will provide consumers consistency, have less impact on customer dialing patterns, and can be implemented without substantial cost and delay of switch development. Regardless of which option is ultimately selected by the FCC, public safety will be improved. Any of the alternatives described in the proposal will make it easier for excavators to contact owners of buried facilities to have these lines located and marked before they commence excavation.

III. Specific Comments

1. Integration of Existing One Call Center Numbers. The FCC seeks comment on methods to ensure that calls to One Call Centers are "toll-free."

AGA believes it is important to integrate the new three digit dialing code into an existing One Call Center number. When a caller dials the abbreviated dialing code, the carriers would translate the abbreviated dialing code into the appropriate toll-free or local number used by the One Call Center. There has been much time and money invested in advertising the existing One Call Center numbers. The telephone numbers exist on booklets, pipeline markers, fence signs, and other material given to excavators and the public. Changing all of the existing material would be excessive and unnecessary.

2. Originating Switch Location. The FCC seeks comment on whether the originating NPA-NXX should determine the One Call Center into which the number will be translated.

The FCC has proposed that, for wireline-originated calls, the originating area code would determine the One Call Center to which the call is sent. For wireless-originated calls, the proposal is that the originating Mobile Switch Center would determine the One Call Center to which the call is sent.

AGA supports the recommendations of the FCC. They represent the most logical methods to automatically find the correct One Call Center, and when calls are routed to the wrong center, which happens now, the centers can easily direct the caller to the correct center.

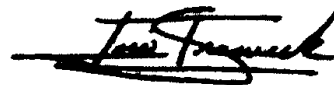
3. Timeframe for Implementation. The FCC seeks comment on the time frame for implementing each abbreviated dialing arrangement proposed in this Notice.

AGA believes the most important issue regarding the time frame of implementation is the effectiveness of the transition. The implementation should be completed as soon as practical. *The one- to three-year time frame mentioned in the notice of proposed rulemaking seems reasonable.* States should be given flexibility in implementing changes to their One Call Centers. However, there must be a firm completion deadline for which the States are held accountable.

AGA would be pleased to provide assistance in publicizing the 3-digit dialing system. AGA and its member companies are already active in coordinating damage prevention efforts with the Common Ground Alliance and other organizations.

The American Gas Association appreciates the opportunity to comment on the proposed regulation.

Respectfully submitted,
THE AMERICAN GAS ASSOCIATION
July 8, 2004



By: _____
Lori S. Traweck
Senior Vice President
American Gas Association

For further information on these comments, please contact:

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